



**U.S. Department of Justice**

*United States Attorney  
District of New Jersey*

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Newark, New Jersey 07102*

*973-645-2700*

January 19, 2021

The Honorable Renée Marie Bumb  
United States District Judge  
United States District Court  
Mitchell H. Cohen U.S. Courthouse  
One John P. Gerry Plaza  
4th & Cooper Streets  
Camden, NJ 08101

Re: United States v. Jeremy Hare  
Crim. No. 18-588 (RMB)

Dear Judge Bumb:

On January 14, 2021, the Court ordered that the Government file a supplemental response clarifying “the number of active COVID-19 cases at FCI Fort Dix” and explaining why the Declaration submitted in support of its brief “and the BOP website report such vastly different numbers of active COVID-19 cases at FCI Fort Dix.”

The United States contacted the Bureau of Prisons, specifically FCI Fort Dix, to address these issues. Please find attached as Exhibit 1 the Declaration of James Gibbs, the Acting Warden at FCI Fort Dix (the “Gibbs Declaration”). As stated in the Gibbs Declaration, the number of COVID-19 positive inmates at FCI Fort Dix as of January 19, 2021 is 59. Further, FCI Fort Dix began providing the COVID-19 vaccine to staff today.


The Gibbs Declaration also explains why the COVID-19 positive inmate number set forth in James Reiser’s January 12, 2021, declaration submitted in

this matter differs from the COVID-19 positive inmate number on the Bureau of Prisons website. As more fully set for in the Gibbs Declaration, the difference is the result of a “lag time” (Declaration ¶ 3) between when FCI Fort Dix is internally aware that an inmate tests COVID-19 positive or is deemed to have recovered and when those updating the BOP’s website possess and update this information.

Thank you for your consideration.

Respectfully submitted,

RACHAEL A. HONIG  
Acting United States Attorney

A handwritten signature in blue ink, appearing to read "Andrew Kogan".

By: Andrew Kogan  
Assistant U.S. Attorney

cc: Linda Foster, Esq.  
*counsel for Jeremy Hare*